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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13
14 v.

15
16 DOUGLAS STEPNEY,
17 LAPRELL KENT,
18 KENNY ADAMS,
19 HANAI IBRAHIM,
20 AISHA MCCAIN,
21 JAVON FEE,
22 TYRICE IVY,
23 REGINALD THOMAS,
24 TERRENCE WEBB,
25 DARIENE BOLDS,
26 DEANTE BROUSSARD,
27 LAMORE JACKS,
28 ALVIN SPADE,
JERRY REYNOLDS,
RENO DEVORE, and
JOHNNY GRAHAM, and
RAY JIMMERSON,

Defendants.

CR-01-0344

VIOLATIONS: 21 U.S.C. § 846 –
Conspiracy to Possess Cocaine (Powder) for
Manufacture of Cocaine Base, and for
Distribution; 21 U.S.C. § 841(a)(1) –
Possession of Cocaine Base With Intent to
Distribute; 21 U.S.C. § 841(a)(1) –
Possession of Cocaine (Powder) With Intent
Manufacture and Distribute; 21 U.S.C. §
843(b) – Use of a Communication Facility
(Telephone) to Commit Felony Drug Offense;
18 U.S.C. § 924(o) – Conspiracy to Use and
Carry Firearms During and in Relation to
Trafficking Crimes in Violation of 18 U.S.C.
§ 924(c); 18 U.S.C. § 924(c)(1)(A) – Using,
Carrying, or Possessing a Firearm During and
In Relation to Drug Conspiracy and Crime of
of Violence; 18 U.S.C. § 922(o) – Possession
of Machinegun; 21 U.S.C. 856 – Maintaining
Place for Manufacturing Crack Cocaine; 21
U.S.C. § 860(a) – Distribution of Crack
Cocaine Within 1,000 Feet of Playground;
18 U.S.C. § 922(g)(1) – Felon in Possession
of a Firearm; 18 U.S.C. § 3 – Accessory After
the Fact.

INDICTMENT

1 The Grand Jury charges:

2 COUNT ONE: 21 U.S.C. § 846

3 1. On or about between June 7, 2001 and August 28, 2001, both dates being
4 approximate and inclusive, in the Northern District of California, the defendants

5 DOUGLAS STEPNEY,
6 LAPRELL KENT,
7 KENNY ADAMS,
8 RAY JIMMERSON,
9 HANAI IBRAHIM,
10 AISHA McCain,
11 JAVON FEE,
12 TYRICE IVY,
13 REGINALD THOMAS,
14 TERRENCE WEBB,
15 DARIENE BOLD,
16 DEANTE BROUSSARD,
17 LAMORE JACKS,
18 ALVIN SPADE,
19 JERRY REYNOLDS,
20 RENO DEVORE, and
21 JOHNNY GRAHAM,

22 and others, did knowingly and intentionally conspire to possess approximately four
23 kilograms or more of cocaine (powder) with intent to manufacture cocaine base (crack
24 cocaine) and to distribute, and to possess and distribute approximately 600 grams or more
25 of cocaine base, in violation of Title 21, United States Code, Section 846.

26 2. Prior to the date of the offense alleged herein, defendant DOUGLAS
27 STEPNEY had been convicted on June 4, 1992, of a felony drug offense in San Francisco
28 County Superior Court, Case Number 145356, for possession of cocaine base for sale in
violation of Section 11351.5 of the California Health and Safety Code.

3 3. Prior to the date of the offense alleged herein, defendant LAPRELL KENT
4 had been convicted on October 15, 1997, of a felony drug offense in San Francisco
5 County Superior Court, Case Number 169087, for possession of cocaine base for sale in
6 violation of Section 11351.5 of the California Health and Safety Code.

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1 COUNT TWO: 21 U.S.C. § 841(a)(1)

2 1. On or about June 22, 2001, in the Northern District of California, the
3 defendants

4 LAPRELL KENT,
5 KENNY ADAMS, and
JAVON FEE

6 did knowingly and intentionally possess with intent to distribute, and did distribute, a
7 Schedule II controlled substance, to wit, approximately 102.83 grams of cocaine base, in
8 violation of Title 21, United States Code, Section 841(a)(1).

9 2. Prior to the date of the offense alleged herein, defendant LAPRELL KENT
10 had been convicted on October 15, 1997, of a felony drug offense in San Francisco
11 County Superior Court, Case Number 169087, for possession of cocaine base for sale in
12 violation of Section 11351.5 of the California Health and Safety Code.

13
14 COUNT THREE: 21 U.S.C. § 860(a)

15 On or about June 22, 2001, in the Northern District of California, the defendants

16 LAPRELL KENT,
17 KENNY ADAMS, and
JAVON FEE

18 did knowingly violate 21 U.S.C. § 841(a)(1) by possessing cocaine base with intent to
19 distribute and distributing cocaine base as charged in Count Two herein, within one
20 thousand (1,000) feet of a playground as defined by 21 U.S.C. § 860(e)(1), in violation of
21 Title 21, United States Code, Section 860(a).

22
23 COUNT FOUR: 21 U.S.C. § 843(b)

24 On or about June 22, 2001, at approximately 10:16 a.m., in the Northern District of
25 California, the defendants

26 LAPRELL KENT, and
27 KENNY ADAMS

28 did knowingly and intentionally use a communication facility (a telephone), in

1 committing, causing, and facilitating the commission of a felony under the Controlled
2 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
3 Section 843(b).

4
5 COUNT FIVE: 21 U.S.C. § 843(b)

6 On or about June 22, 2001, at approximately 1:28 p.m., in the Northern District of
7 California, the defendants

8 LAPRELL KENT, and
9 JAVON FEE

10 did knowingly and intentionally use a communication facility (a telephone), in
11 committing, causing, and facilitating the commission of a felony under the Controlled
12 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
13 Section 843(b).

14 COUNT SIX: 21 U.S.C. § 843(b)

15 On or about June 22, 2001, at approximately 2:15 p.m., in the Northern District of
16 California, the defendants

17 LAPRELL KENT,
18 KENNY ADAMS, and
19 JAVON FEE

20 did knowingly and intentionally use a communication facility (a telephone), in
21 committing, causing, and facilitating the commission of a felony under the Controlled
22 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
23 Section 843(b).

24 COUNT SEVEN: 21 U.S.C. § 841(a)(1)

25 1. On or about June 27, 2001, in the Northern District of California, the
26 defendants

27 DOUGLAS STEPNEY, and
28 LAPRELL KENT

1 did knowingly and intentionally possess a Schedule II controlled substance, to wit,
2 approximately one kilogram of cocaine, with intent to manufacture cocaine base and to
3 distribute in violation of Title 21, United States Code, Section 841(a)(1).

4 2. Prior to the date of the offense alleged herein, defendant DOUGLAS
5 STEPNEY had been convicted on June 4, 1992, of a felony drug offense in San Francisco
6 County Superior Court, Case Number 145356, for possession of cocaine base for sale in
7 violation of Section 11351.5 of the California Health and Safety Code.

8 3. Prior to the date of the offense alleged herein, defendant LAPRELL KENT
9 had been convicted on October 15, 1997, of a felony drug offense in San Francisco
10 County Superior Court, Case Number 169087, for possession of cocaine base for sale in
11 violation of Section 11351.5 of the California Health and Safety Code.

12
13 COUNT EIGHT: 21 U.S.C. § 843(b)

14 On or about June 27, 2001, at approximately 7:13 p.m., in the Northern District of
15 California, the defendants

16 LAPRELL KENT, and
17 HANAI IBRAHIM

18 did knowingly and intentionally use a communication facility (a telephone), in
19 committing, causing, and facilitating the commission of a felony under the Controlled
20 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
21 Section 843(b).

22 COUNT NINE: 21 U.S.C. § 843(b)

23 On or about June 27, 2001, at approximately 11:00 p.m., in the Northern District of
24 California, the defendant

25 DOUGLAS STEPNEY

26 did knowingly and intentionally use a communication facility (a telephone), in
27 committing, causing, and facilitating the commission of a felony under the Controlled
28

1 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
2 Section 843(b).

3
4 COUNT TEN: 21 U.S.C. § 841(a)(1)

5 1. On or about June 27, 2001, in the Northern District of California, the
6 defendant

7 DOUGLAS STEPNEY

8 did knowingly and intentionally possess with intent to distribute a Schedule II controlled
9 substance, to wit, approximately 50 grams of cocaine base, in violation of Title 21, United
10 States Code, Section 841(a)(1).

11 2. Prior to the date of the offense alleged herein, defendant DOUGLAS
12 STEPNEY had been convicted on June 4, 1992, of a felony drug offense in San Francisco
13 County Superior Court, Case Number 145356, for possession of cocaine base for sale in
14 violation of Section 11351.5 of the California Health and Safety Code.

15
16 COUNT ELEVEN: 21 U.S.C. § 843(b)

17 On or about June 28, 2001, at approximately 9:39 a.m., in the Northern District of
18 California, the defendant

19 DOUGLAS STEPNEY

20 did knowingly and intentionally use a communication facility (a telephone), in
21 committing, causing, and facilitating the commission of a felony under the Controlled
22 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
23 Section 843(b).

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1 COUNT TWELVE: 21 U.S.C. § 843(b)

2 On or about June 28, 2001, at approximately 11:33 a.m., in the Northern District of
3 California, the defendants

4 LAPRELL KENT, and
5 HANAI IBRAHIM,

6 did knowingly and intentionally use a communication facility (a telephone), in
7 committing, causing, and facilitating the commission of a felony under the Controlled
8 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
9 Section 843(b).

10 COUNT THIRTEEN: 21 U.S.C. § 841(a)(1)

11 1. On or about July 1, 2001, in the Northern District of California, the
12 defendants

13 DOUGLAS STEPNEY,
14 LAPRELL KENT, and
15 ALVIN SPADE

16 did knowingly and intentionally possess with intent to distribute and did distribute a
17 Schedule II controlled substance, to wit, approximately 23 grams of cocaine base, in
18 violation of Title 21, United States Code, Section 841(a)(1).

19 2. Prior to the date of the offense alleged herein, defendant DOUGLAS
20 STEPNEY had been convicted on June 4, 1992, of a felony drug offense in San Francisco
21 County Superior Court, Case Number 145356, for possession of cocaine base for sale in
22 violation of Section 11351.5 of the California Health and Safety Code.

23 3. Prior to the date of the offense alleged herein, defendant LAPRELL KENT
24 had been convicted on October 15, 1997, of a felony drug offense in San Francisco
25 County Superior Court, Case Number 169087, for possession of cocaine base for sale in
26 violation of Section 11351.5 of the California Health and Safety Code.

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1 COUNT FOURTEEN: 21 U.S.C. § 843(b)

2 On or about July 1, 2001, at approximately 8:51 a.m., in the Northern District of
3 California, the defendants

4 LAPRELL KENT, and
5 ALVIN SPADE

6 did knowingly and intentionally use a communication facility (a telephone), in
7 committing, causing, and facilitating the commission of a felony under the Controlled
8 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
9 Section 843(b).

10 COUNT FIFTEEN: 21 U.S.C. § 841(a)(1)

11 1. On or about July 5, 2001, in the Northern District of California, the
12 defendants

13 DOUGLAS STEPNEY,
14 LAPRELL KENT, and
15 AISHA McCAIN

16 did knowingly and intentionally possess a Schedule II controlled substance, to wit,
17 approximately one kilogram of cocaine, with intent to manufacture cocaine base and to
18 distribute, in violation of Title 21, United States Code, Section 841(a)(1).

19 2. Prior to the date of the offense alleged herein, defendant DOUGLAS
20 STEPNEY had been convicted on June 4, 1992, of a felony drug offense in San Francisco
21 County Superior Court, Case Number 145356, for possession of cocaine base for sale in
22 violation of Section 11351.5 of the California Health and Safety Code.

23 3. Prior to the date of the offense alleged herein, defendant LAPRELL KENT
24 had been convicted on October 15, 1997, of a felony drug offense in San Francisco
25 County Superior Court, Case Number 169087, for possession of cocaine base for sale in
26 violation of Section 11351.5 of the California Health and Safety Code.

1 COUNT SIXTEEN: 21 U.S.C. § 843(b)

2 On or about July 5, 2001, at approximately 7:43 p.m., in the Northern District of
3 California, the defendant

4 DOUGLAS STEPNEY

5 did knowingly and intentionally use a communication facility (a telephone), in
6 committing, causing, and facilitating the commission of a felony under the Controlled
7 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
8 Section 843(b).

9
10 COUNT SEVENTEEN: 21 U.S.C. § 843(b)

11 On or about July 5, 2001, at approximately 10:43 p.m., in the Northern District of
12 California, the defendant

13 DOUGLAS STEPNEY

14 did knowingly and intentionally use a communication facility (a telephone), in
15 committing, causing, and facilitating the commission of a felony under the Controlled
16 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
17 Section 843(b).

18
19 COUNT EIGHTEEN: 21 U.S.C. § 843(b)

20 On or about July 5, 2001, at approximately 10:58 p.m., in the Northern District of
21 California, the defendants

22 DOUGLAS STEPNEY, and
23 AISHA McCain

24 did knowingly and intentionally use a communication facility (a telephone), in
25 committing, causing, and facilitating the commission of a felony under the Controlled
26 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
27 Section 843(b).

1 COUNT NINETEEN: 21 U.S.C. § 843(b)

2 On or about July 6, 2001, at approximately 9:58 a.m., in the Northern District of
3 California, the defendant

4 LAPRELL KENT

5 did knowingly and intentionally use a communication facility (a telephone), in
6 committing, causing, and facilitating the commission of a felony under the Controlled
7 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
8 Section 843(b).

9
10 COUNT TWENTY: 21 U.S.C. § 841(a)(1)

11 1. On or about July 6, 2001, in the Northern District of California, the
12 defendants

13 DOUGLAS STEPNEY,
14 LAPRELL KENT, and
JERRY REYNOLDS

15 did knowingly and intentionally possess a Schedule II controlled substance, to wit,
16 approximately two kilograms of cocaine, with intent to manufacture cocaine base and to
17 distribute, in violation of Title 21, United States Code, Section 841(a)(1).

18 2. Prior to the date of the offense alleged herein, defendant DOUGLAS
19 STEPNEY had been convicted on June 4, 1992, of a felony drug offense in the San
20 Francisco County Superior Court, Case Number 145356, for possession of cocaine base
21 for sale in violation of Section 11351.5 of the California Health and Safety Code.

22 3. Prior to the date of the offense alleged herein, defendant LAPRELL KENT
23 had been convicted on October 15, 1997, of a felony drug offense in San Francisco
24 County Superior Court, Case Number 169087, for possession of cocaine base for sale in
25 violation of Section 11351.5 of the California Health and Safety Code.

1 COUNT TWENTY-ONE: 21 U.S.C. § 843(b)

2 On or about July 4, 2001, at approximately 8:54 p.m., in the Northern District of
3 California, the defendant

4 DOUGLAS STEPNEY

5 did knowingly and intentionally use a communication facility (a telephone), in
6 committing, causing, and facilitating the commission of a felony under the Controlled
7 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
8 Section 843(b).

9
10 COUNT TWENTY-TWO: 21 U.S.C. § 843(b)

11 On or about July 5, 2001, at approximately 8:07 p.m., in the Northern District of
12 California, the defendants

13 DOUGLAS STEPNEY, and
14 JERRY REYNOLDS

15 did knowingly and intentionally use a communication facility (a telephone), in
16 committing, causing, and facilitating the commission of a felony under the Controlled
17 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
18 Section 843(b).

19 COUNT TWENTY-THREE: 21 U.S.C. § 843(b)

20 On or about July 6, 2001, at approximately 11:37 a.m., in the Northern District of
21 California, the defendant

22 DOUGLAS STEPNEY

23 did knowingly and intentionally use a communication facility (a telephone), in
24 committing, causing, and facilitating the commission of a felony under the Controlled
25 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
26 Section 843(b).

1 COUNT TWENTY-FOUR: 21 U.S.C. § 843(b)

2 On or about July 6, 2001, at approximately 11:39 a.m., in the Northern District of
3 California, the defendants

4 DOUGLAS STEPNEY, and
5 JERRY REYNOLDS

6 did knowingly and intentionally use a communication facility (a telephone), in
7 committing, causing, and facilitating the commission of a felony under the Controlled
8 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
9 Section 843(b).

10 COUNT TWENTY-FIVE: 21 U.S.C. § 843(b)

11 On or about July 6, 2001, at approximately 1:21 p.m., in the Northern District of
12 California, the defendant

13 DOUGLAS STEPNEY

14 did knowingly and intentionally use a communication facility (a telephone), in
15 committing, causing, and facilitating the commission of a felony under the Controlled
16 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
17 Section 843(b).

18
19 COUNT TWENTY-SIX: 21 U.S.C. § 843(b)

20 On or about July 6, 2001, at approximately 2:50 p.m., in the Northern District of
21 California, the defendant

22 DOUGLAS STEPNEY

23 did knowingly and intentionally use a communication facility (a telephone), in
24 committing, causing, and facilitating the commission of a felony under the Controlled
25 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
26 Section 843(b).

1 COUNT TWENTY-SEVEN: 21 U.S.C. § 843(b)

2 On or about July 6, 2001, at approximately 5:39 p.m., in the Northern District of
3 California, the defendants

4 DOUGLAS STEPNEY, and
5 LAPRELL KENT

6 did knowingly and intentionally use a communication facility (a telephone), in
7 committing, causing, and facilitating the commission of a felony under the Controlled
8 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
9 Section 843(b).

10 COUNT TWENTY-EIGHT: 21 U.S.C. § 841(a)(1)

11 1. On or about July 19, 2001, in the Northern District of California, the
12 defendants

13 LAPRELL KENT, and
14 TYRICE IVY

15 did knowingly and intentionally possess with intent to distribute and did distribute, a
16 Schedule II controlled substance, to wit, approximately 13.55 grams of cocaine base, in
17 violation of Title 21, United States Code, Section 841(a)(1).

18 2. Prior to the date of the offense alleged herein, defendant LAPRELL KENT
19 had been convicted on October 15, 1997, of a felony drug offense in San Francisco
20 County Superior Court, Case Number 169087, for possession of cocaine base for sale in
21 violation of Section 11351.5 of the California Health and Safety Code.

22
23 COUNT TWENTY-NINE: 21 U.S.C. § 860(a)

24 On or about July 19, 2001, in the Northern District of California, the defendants

25 LAPRELL KENT, and
26 TYRICE IVY

27 did knowingly violate 21 U.S.C. § 841(a)(1) by possessing cocaine base with intent to
28 distribute as charged in Count Twenty-Eight herein, within one thousand (1,000) feet of a

1 playground as defined by 21 U.S.C. § 860(e)(1), in violation of Title 21, United States
2 Code, Section 860(a).

3
4 COUNT THIRTY: 21 U.S.C. 843(b)

5 On or about July 19, 2001, at approximately 1:25 p.m., in the Northern District of
6 California, the defendants

7 LAPRELL KENT, and
8 TYRICE IVY

9 did knowingly and intentionally use a communication facility (a telephone), in
10 committing, causing, and facilitating the commission of a felony under the Controlled
11 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
12 Section 843(b).

13
14 COUNT THIRTY-ONE: 21 U.S.C. 843(b)

15 On or about July 19, 2001, at approximately 2:52 p.m., in the Northern District of
16 California, the defendants

17 LAPRELL KENT, and
18 TYRICE IVY

19 did knowingly and intentionally use a communication facility (a telephone), in
20 committing, causing, and facilitating the commission of a felony under the Controlled
21 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
22 Section 843(b).

23 COUNT THIRTY-TWO: 21 U.S.C. § 841(a)(1)

24 1. On or about August 9, 2001, in the Northern District of California, the
25 defendants

26 DOUGLAS STEPNEY, and
27 AISHA McCAIN

28 did knowingly and intentionally possess with intent to distribute a Schedule II controlled
substance, to wit, approximately 466 grams of cocaine base, in violation of Title 21,

1 United States Code, Section 841(a)(1).

2 2. Prior to the date of the offense alleged herein, defendant DOUGLAS
3 STEPNEY had been convicted on June 4, 1992, of a felony drug offense in San Francisco
4 County Superior Court, Case Number 145356, for possession of cocaine base for sale in
5 violation of Section 11351.5 of the California Health and Safety Code.

6
7 COUNT THIRTY-THREE: 21 U.S.C. § 856(a)(1)

8 On or about and between March 13, 2001 and August 9, 2001, both dates being
9 approximate and inclusive, in the Northern District of California, the defendants

10 DOUGLAS STEPNEY, and
11 AISHA McCain

12 did knowingly maintain a place, to wit, Apartment # 44 at 358 Alida Way, South San
13 Francisco, California, for the purpose of manufacturing cocaine base (crack cocaine), a
14 Schedule II controlled substance, in violation of Title 21, United States Code, Section
15 856(a)(1).

16 COUNT THIRTY-FOUR: 21 U.S.C. § 841(a)(1)

17 1. On or about August 9, 2001, in the Northern District of California, the
18 defendants

19 DOUGLAS STEPNEY,
20 AISHA McCain, and
21 RAY JIMMERSON

22 did knowingly and intentionally possess a Schedule II controlled substance, to wit,
23 approximately 99.37 grams of cocaine (powder), with intent to manufacture cocaine base
24 and to distribute in violation of Title 21, United States Code, Section 841(a)(1).

25 2. Prior to the date of the offense alleged herein, defendant DOUGLAS
26 STEPNEY had been convicted on June 4, 1992, of a felony drug offense in San Francisco
27 County Superior Court, Case Number 145356, for possession of cocaine base for sale in
28 violation of Section 11351.5 of the California Health and Safety Code.

1 COUNT THIRTY-FIVE: 21 U.S.C. § 843(b)

2 On or about August 8, 2001, at approximately 9:37 p.m., in the Northern District
3 of California, the defendants

4 DOUGLAS STEPNEY, and
5 ALVIN SPADE

6 did knowingly and intentionally use a communication facility (a telephone), in
7 committing, causing, and facilitating the commission of a felony under the Controlled
8 Substances Act (21 U.S.C. § 801 et seq.) in violation of Title 21, United States Code,
9 Section 843(b).

10 COUNT THIRTY-SIX: 21 U.S.C. § 841(a)(1)

11 1. On or about August 13, 2001, in the Northern District of California, the
12 defendant

13 RENO DEVORE

14 did knowingly and intentionally possess with intent to distribute, a Schedule II controlled
15 substance, to wit, approximately 10.63 grams of cocaine base (crack cocaine), in violation
16 of Title 21, United States Code, Section 841(a)(1).

17 2. Prior to the date of the offense alleged herein, the defendant had been
18 convicted on or about June 23, 1999, of a felony drug offense in San Francisco County
19 Superior Court, Case Number 01809355, for possession of a cocaine base for sale in
20 violation of Section 11351.5 of the California Health and Safety Code.

21 COUNT THIRTY-SEVEN: 21 U.S.C. § 860(a)

22 On or about August 13, 2001, in the Northern District of California, the defendant

23 RENO DEVORE

24 did knowingly violate 21 U.S.C. § 841(a)(1) by possessing cocaine base with intent to
25 distribute as charged in Count Thirty-Six herein, within one thousand (1,000) feet of a
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1 playground as defined by 21 U.S.C. § 860(e)(1), in violation of Title 21, United States
2 Code, Section 860(a).

3
4 COUNT THIRTY-EIGHT: 18 U.S.C. § 924(o)

5 1. On or about between June 7, 2001 and August 28, 2001, both dates being
6 approximate and inclusive, in the Northern District of California, the defendants

7 DOUGLAS STEPNEY,
8 LAPRELL KENT,
9 KENNY ADAMS,
10 RAY JIMMERSON,
11 HANAI IBRAHIM,
12 REGINALD THOMAS,
TERRENCE WEBB,
DARIENE BOLDS,
DEANTE BROUSSARD,
LAMORE JACKS, and
JOHNNY GRAHAM,

13 and others, did knowingly and intentionally conspire to use and carry firearms and aid and
14 abet in the use and carrying of firearms during and in relation to the drug conspiracy
15 charged in Count One herein, and to possess firearms in furtherance of this drug
16 conspiracy, in violation of 18 U.S.C. §§ 924(c)(1)(A) and 2.

17 **MANNER AND MEANS OF THE CONSPIRACY**

18 2. It was part of the manner and means of the conspiracy that:

19 (a) The defendants were members or associates of a group of individuals
20 comprising a violent street gang known as "Big Block" in the Northridge/Harbor Road
21 area of the Hunters Point District in San Francisco, California.

22 (b) Members and associates of Big Block possessed crack cocaine for sale and
23 distributed crack cocaine in that area of San Francisco, and elsewhere.

24 (c) In order to protect their "drug turf" and profits derived from their drug
25 trafficking, among other reasons, the Big Block gang used violence, intimidation, and
26 armed assaults against other drug traffickers and rival gangs.

27 (d) Big Block members acquired, possessed, and had access to firearms,
28 including automatic weapons.

1 (e) During the period of the conspiracy, defendant DOUGLAS STEPNEY was
2 the leader of the Big Block gang, and he had knowledge of the possession and
3 accessibility of firearms, including machineguns, to Big Block members, and he had the
4 power and intention to control the use of such firearms by members of Big Block.

5 (f) Big Block members and associates communicated with each other by
6 telephone as to the location of rival gang members.

7 (g) Big Block members and associates planned and discussed opportunities to
8 commit armed assaults against rival gang members, and encouraged the commission of
9 such assaults.

10 OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

11 3. In furtherance of the conspiracy and to obtain the objectives thereof, the
12 defendants committed the following overt acts, among others, in the Northern District of
13 California:

14 (h) On or about June 14, 2001, defendant LAPRELL KENT possessed a Ruger
15 brand firearm.

16 (i) On June 22, 2001, defendant JOHNNY GRAHAM possessed and carried a
17 loaded firearm, with an obliterated serial number.

18 (j) On June 25, 2001, defendant KENNY ADAMS used one or more firearms,
19 including a machinegun, to shoot at one or more members of a rival gang in the
20 Westpoint housing area of Hunters Point District in San Francisco.

21 (k) On July 22, 2001, defendants LAPRELL KENT and RAY JIMMERSON
22 used a firearm, or aided and abetted in the use of a firearm, to shoot from a car at one or
23 more members of a rival gang who were in another car as both cars were driving in the
24 San Francisco area.

25 (l) On August 19, 2001, defendants TERRENCE WEBB, DEANTE
26 BROUSSARD, and DARIENE BOLDS, used at least two firearms, including two
27 machineguns, or aided and abetted in the use of such firearms, to shoot at one or more
28 members of a rival gang in the area of Middlepoint Road in San Francisco.

1 All in violation of Title 18, United States Code, Section 924(o).

2
3 COUNT THIRTY-NINE: 18 U.S.C. § 924(c)(1)(A)

4 On or about June 14, 2001, in the Northern District of California, the defendant
5 LAPRELL KENT
6 did knowingly possess a Ruger firearm in furtherance of the drug conspiracy charged in
7 Count One herein, in violation of Title 18, United States Code, Section 924(c)(1)(A).

8
9 COUNT FORTY: 18 U.S.C. § 922(g)(1)

10 On or about June 14, 2001, in the Northern District of California, the defendant
11 LAPRELL KENT,
12 having previously been convicted of a felony crime punishable by a term of imprisonment
13 exceeding one year, did knowingly possess a Ruger firearm in and affecting commerce in
14 violation of Title 18, United States Code, Section 922(g)(1).

15
16 COUNT FORTY-ONE: 18 U.S.C. § 924(c)(1)(A)

17 On or about June 22, 2001, in the Northern District of California, the defendant
18 JOHNNY GRAHAM
19 did knowingly carry a firearm during and in relation to the drug conspiracy charged in
20 Count One, and did knowingly possess a firearm in furtherance of such crime, in violation
21 of Title 18, United States Code, Section 924(c)(1)(A).

22
23 COUNT FORTY-TWO: 18 U.S.C. §§ 924(c)(1)(A) and (B)(ii), 2

24 1. On or about June 25, 2001, in the Northern District of California, the
25 defendant

26 DOUGLAS STEPNEY, and
27 KENNY ADAMS

28 did knowingly carry and use a firearm, or did aid and abet in such carrying and use,
during and in relation to the drug conspiracy charged in Count One and the conspiracy to

1 use and carry firearms charged in Count Thirty-Eight herein, and did knowingly possess
2 one or more firearms in furtherance of such crimes.

3 2. In committing the crime alleged in paragraph one herein, the defendants
4 discharged a firearm, or aided and abetted in the discharge of such firearm.

5 3. At least one of the firearms used in the commission of this offense was a
6 machinegun.

7 All in violation of Title 18, United States Code, Section 924(c)(1)(A) and (B)(ii).
8

9 COUNT FORTY-THREE: 18 U.S.C. §§ 922(o), 2

10 On or about June 25, 2001, in the Northern District of California, the defendants

11 DOUGLAS STEPNEY, and
12 KENNY ADAMS

13 did knowingly possess, or did aid and abet in the possession of, a machinegun.
14

15 COUNT FORTY-FOUR: 18 U.S.C. §§ 924(c)(1)(A), 2

16 1. On or about July 24, 2001, in the Northern District of California, the
17 defendants

18 LAPRELL KENT, and
19 RAY JIMMERSON

20 did knowingly use and carry a firearm during and in relation to the drug conspiracy
21 charged in Count One and the conspiracy to use and carry firearms charged in Count
22 Thirty-Eight herein, did knowingly possess a firearm in furtherance of such crimes.

23 2. In committing the crime alleged in paragraph one herein, the defendant
24 discharged a firearm, or aided and abetted in the discharge of a firearm.

25 All in violation of Title 18, United States Code, Section 924(c)(1)(A).
26

27 //

28 //

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1 COUNT FORTY-FIVE: 18 U.S.C. §§ 924(c)(1)(A) and (B)(ii), 2

2 1. On or about August 19, 2001, in the Northern District of California, the
3 defendants

4 DOUGLAS STEPNEY,
5 TERRENCE WEBB,
6 DEANTE BROUSSARD,
7 DARIENE BOLDS,

8 did knowingly use and carry at least two firearms during and in relation to the drug
9 conspiracy charged in Count One and the conspiracy to use and carry firearms charged in
10 Count Thirty-Eight herein, and did knowingly possess at least two firearms in furtherance
11 of such crimes.

12 2. In committing the crimes alleged in paragraph one herein, the defendants
13 discharged one or more firearms.

14 3. At least two of the firearms used in the commission of this offense were
15 machineguns.

16 All in violation of Title 18, United States Code, Section 924(c)(1)(A) and (B)(ii).

17 COUNT FORTY-SIX: 18 U.S.C. §§ 922(o), 2

18 On or about August 19, 2001, in the Northern District of California, the defendants

19 DOUGLAS STEPNEY,
20 TERRENCE WEBB,
21 DEANTE BROUSSARD, and
22 DARIENE BOLDS,

23 did knowingly possess, or did aid and abet in the possession of, two machineguns.

24 COUNT FORTY-SEVEN: 18 U.S.C. §§ 3, 924(c)(1)(A) and (B)(ii), 2

25 On or about August 19, 2001, in the Northern District of California, the defendant

26 HANAI IBRAHIM

27 knowing that an offense had been committed against the United States, to wit, the use and
28 carrying of firearms charged in Count Forty-Five herein in violation of 18 U.S.C. §§

1 924(c)(1)(A) and 2, did receive and assist the offenders in order to hinder and prevent
2 their apprehension, trial, and punishment, in violation of Title 18, United States Code,
3 Section 3.

4
5 DATED:

A TRUE BILL.

6
7
8 FOREPERSON

9
10 DAVID W. SHAPIRO
United States Attorney

11
12 
13 LESLIE R. CALDWELL (NYSBN 1950591)
14 Chief, Criminal Division

15
16 (Approved as to form: )
17 AUSA GLBEVANJR